

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

UNITED STATES OF AMERICA,)	
)	
v.)	CASE NO.: 5:21-cr-0009
)	
JUANA IBARRO CARRILLO,)	
)	
Defendant.)	
)	

**DEFENDANT’S RESPONSE TO GOVERNMENTS’S MOTION FOR ORDER
ALLOWING THE GOVERNMENT TO MAINTAIN CUSTODY OF SEIZED ITEMS**

COMES NOW, W. JOSEPH TURNER, the undersigned counsel, and respectfully submits a response:

Defendant, Juana Ibarro Carrillo, by and through undersigned counsel, hereby files her response to the Governments’s motion (Doc. 98). Ms. Carrillo states the following:

1. One (1) bag of assorted jewelry seized from 423 W. 12th Street, Alma, Georgia, containing Four (4) rings, Five (5) bracelets, Two (20) collections of ear rings, and One (1) necklace. Defendant acquired the jewelry over the period of her lifetime.
2. One (1) long pink box of miscellaneous jewelry.
3. Eighteen (18) Nike shoe boxes containing cash bundles in the total amount of \$189,200.00 in U.S. Currency.
4. Eighteen (18) Easter bags containing cash bundles in the total amount of \$62,480.00 in U.S. Currency.
5. \$4,400.00.00 in U.S. Currency from 130 Red River Lane Alma, Georgia.
6. \$20,432.00 in U.S. Currency seized from 163 Johnson Lake Road, Alma, Georgia.

7. \$60,825.00 is U.S. Currency seized from the Safe Deposit Box 113 at FNB South, Alma, Georgia.
8. Under the calculations of the Defendant, there was more seized than in the Government's Motion for Allowing the Government to Maintain Custody of Seized Items. Defendant is without knowledge of the exact amount of her lawful property that was seized but it estimates approximately \$340,000.00.
9. The defendant objects to the Governments seizure and forfeiture of her property, as her property was neither used for, nor the proceeds of, any unlawful activity. All of the money seized was the result of legitimate business operation by the Defendant. Defendant is in possession of land sale receipts that document the source of these funds. Said receipts are too voluminous to be attached as exhibits, but Defendant will gladly provide them to the Government or to the Court upon request.

WHEREFORE, the Defendant requests the Court to grant the relief sought herein and enter its order.

Respectfully submitted, this 14th day of January, 2022.

/s/ W. Joseph Turner

W. Joseph Turner
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State Bar No.: 513605

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CERTIFICATE OF SERVICE

I hereby certify that this day I have served counsel for all parties with a copy of the foregoing pleading by filing through the CM/ECF system.

This 14th day of January, 2022.

/s/ *W. Joseph Turner*
W. Joseph Turner
Attorney for Defendant
State Bar No.: 513605

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